

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,¹) Case No. 01-01139 (KJC)
) (Jointly Administered)
Reorganized Debtors.)
) Re docket no. _____
) Hearing Agenda item no. _____

**SCHEDULING ORDER RE THIRTY-EIGHTH OMNIBUS OBJECTION TO CLAIMS
FILED BY SGH ENTERPRISES, INC. (SUBSTANTIVE AND NON-SUBSTANTIVE
OBJECTION)**

Upon consideration of the *Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)*, dated August 18, 2015 [Docket no. 32600] (the “Objection”) and *SGH Enterprises, Inc.’s Response to Thirty-Eighth Omnibus Objection to Claims Filed by SGH Enterprises, Inc. (Substantive and Non-Substantive Objection)*, dated October 19, 2015 [Docket no. 32633] (the “SGH Response”), it is hereby ORDERED that:²

Pre-Discovery Dispositive Motions

1. On or before 75 days after the date hereof, The Reorganized Debtors and SGH Enterprises, Inc. (“SGH” or “Claimant,” together with the Reorganized Debtors, the “Parties”), may file one or more cross-motions for summary judgment (the “Summary Judgment Motions”) as to issues relating to the allowance or disallowance of the SGH Claim that are ripe for summary judgment.
2. The non-moving party shall file a response no later than 30 days thereafter.

¹ The Reorganized Debtors comprise W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) and W. R. Grace & Co. Conn. (“Grace-Conn.”).

² Capitalized terms not defined herein shall have the meaning ascribed to them in the Objection or the SGH Response, as the case may be.

3. Moving parties shall be entitled to file replies no later than 15 days after responses are filed.
4. Discovery shall be stayed as to all matters 180 days after replies are filed (the “Discovery Commencement Date”); *provided, however*, that discovery shall go forward only as to those matters not disposed of by a prior final order of summary judgment.

Document Production & Written Discovery

5. The Parties shall serve requests to each other for production and written discovery on or before 15 days after the Discovery Commencement Date.
6. Parties shall have 45 days to substantially comply with requests for production and written discovery (“Document Production Completion Date”).

Disclosure of Witnesses and Non-Retained Experts Not Filing Expert Reports

7. The Parties shall:
 - a. Disclose all witnesses, including those witnesses that a Party is designating as expert pursuant to Fed. R. Civ. P. 26(a)(2)(C), on or before 15 days after the Document Production Completion Date.
 - b. Make the disclosures required by Fed. R. Civ. P. 26(a)(2)(C) on or before 30 days thereafter.

Depositions

8. The Parties shall:
 - a. Serve notices of deposition on or before 30 days after the Document Production Completion Date.
 - b. Complete all depositions on or before 45 days after notices are served (the “Fact Witness Deposition Completion Date”).

Retained Experts

9. The Parties shall comply with Fed.R.Civ.P. 26(a)(2)(A), regarding disclosure of any retained experts on or before the Fact Witness Deposition Completion Date.

10. The Parties shall serve expert reports in compliance with Fed.R.Civ.P. 26(a)(2)(B) on or before 30 days thereafter.
11. Pursuant to Fed.R.Civ.P. 26(a)(2)(D)(ii), the Parties shall serve rebuttal expert reports (if any) on or before 15 after the date on which expert reports are served.
12. All retained expert discovery as to Non-Summary Judgment Claims shall be completed on or before 75 days after the Document Production Completion Date (the “Retained Expert Discovery Deadline”).

Completion of Discovery

13. All fact discovery shall be completed on or before 150 days after the Document Production Completion Date (the “Discovery Completion Date”).

Post-Discovery, Pre-Trial Dispositive Motions

14. Dispositive motions (if any) filed prior to trial must be filed on or before 30 days after the Discovery Completion Date (the “Pre-Trial Dispositive Motion Deadline”).
15. The non-moving party shall file a response no later than 30 days after the Pre-Trial Dispositive Motion Deadline (the “Pre-Trial Dispositive Motion Response Deadline”).
16. Moving parties shall be entitled to file replies no later than 15 days after the Pre-Trial Dispositive Motion Response Deadline.

Status Reports

17. The Reorganized Debtors shall file with the Court a status report forty-five (45) days after entry of this Order and every 45 days thereafter, and thirty (30), twenty (20) and ten (10) days prior to trial regarding the status of the SGH Claim Objection.

Other Matters

18. ***Mediation.*** The Parties agree to meet and confer over the appointment of a mediator within 30 days after the Document Production Completion Date.

19. To the extent that a deadline falls on a federal holiday or weekend, the deadline shall be the first succeeding day of the work week.

Dated: _____, 2016

Honorable Kevin J. Carey
United States Bankruptcy Judge